

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

Glen William Vellner

Case: 2:21-mj-30144
Assigned To : Unassigned
Case No. Assign. Date : 3/24/2021
Description: IN RE: U.S. V. GLEN VELLNER (CMP)(MEV)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 1, 2021 through March 24, 2021 in the county of Macomb and elsewhere in the Eastern District of Michigan, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 USC § 2251	Attempted production of child pornography
18 USC § 2252A(a)(2)	Receipt of child pornography
18 USC § 2252A(a)(5)(B)	Possession of child pornography
18 USC § 1470	Attempted transfer of obscene material to a minor
18 USC § 2422(b)	Coercion and enticement of a minor to engage in unlawful sexual activity

This criminal complaint is based on these facts:
see attached affidavit.

Continued on the attached sheet.



Complainant's signature

Raymond C. Nichols, Special Agent (FBI)
Printed name and title



Judge's signature

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: March 24, 2021

City and state: Detroit, Michigan

Hon. Kimberly G. Altman, United States Magistrate Judge
Printed name and title

**AFFIDAVIT IN SUPPORT OF APPLICATION FOR COMPLAINT
AND ARREST WARRANT**

I, Raymond C. Nichols, a Special Agent with the Federal Bureau of Investigation, being duly sworn, depose and state as follows:

I. INTRODUCTION

1. I have been employed as a Special Agent of the FBI since February 2012 and am currently assigned to the FBI Detroit Division. Prior to being employed by the FBI I obtained a bachelor's degree in computer information systems and was employed as a network/server administrator for approximately 9 years. While employed by the FBI, I have investigated federal criminal violations related to Internet fraud, computer intrusions, and the FBI's Innocent Images National Initiative, which investigates matters involving the online sexual exploitation of children. I have gained experience through training at the FBI Academy, post Academy training, and everyday work related to conducting these types of investigations.

2. I have received training in the area of child pornography and child exploitation and have reviewed numerous examples of child pornography (as defined in 18 U.S.C. § 2256) in all forms of media including computer media. Moreover, I am a federal law enforcement officer who is engaged in enforcing criminal laws, including 18 U.S.C. §§ 2251, 2252A, 1470, and 2422. I am authorized by law to request an arrest warrant.

3. This affidavit is made in support of an application for a criminal complaint and arrest warrant for **GLEN WILLIAM VELLNER** (date of birth **/**/1975) for violations of: 18 U.S.C. § 2251 (attempted production of child pornography), 18 U.S.C. § 2252A(a)(2) (receipt of child pornography), 18 U.S.C. § 2252A(a)(5)(B) (possession of child pornography), 18 U.S.C. § 1470 (attempted transfer of obscene material to a minor), and 18 U.S.C. § 2422(b) (coercion and enticement of a minor to engage in unlawful sexual activity).

4. The statements contained in this affidavit are based in part on information provided by U.S. federal law enforcement agents, written reports about this and other investigations that I have received, directly or indirectly, from other law enforcement agents, including foreign law enforcement agencies, information gathered from investigative sources of information, and my experience, training and background as a Special Agent. Because this affidavit is being submitted for the limited purpose of securing authorization for the requested arrest warrant, I have not included each and every fact known to me concerning this investigation. Instead, I have set forth only the facts that I believe are necessary to establish probable cause that **VELLNER** has violated Title 18 U.S.C. §§ 2251, 2252A(a)(2), 2252A(a)(5)(B), 1470, and 2422(b).

II. PROBABLE CAUSE

5. On January 7, 2021, I was contacted by a citizen (hereafter RP1) of a country other than the USA who resides permanently in that country. RP1 is an adult female who poses as a 13-year-old female on the internet. RP1 reported that she had been involved in sexual communications with an adult male who indicated that he was from Detroit, Michigan, and whose Google Hangouts account identified him as FRANK RIZZO.

6. RP1 provided me with her login credentials for Google Hangouts, and has been providing screen captures of her communications with FRANK RIZZO since January 7, 2021.

7. Based on a review of RP1's screen captures and accounts, RP1 had been communicating with FRANK RIZZO through chat-avenue since at least January 1, 2021. Chat-avenue is an internet-based chatroom. FRANK RIZZO was using the screen name Vorteks on chat-avenue. Within a few minutes of the chat, Vorteks told RP1 that she, "...look younger than 13" (years old). Vorteks' profile on chat avenue contained a photograph that appeared to be an adult male with his hand on his bare penis. The profile listed Vorteks as a 45-year-old male from Costa Rica who had been a member of chat-avenue since December 30, 2020.

8. On January 7, 2021, Vorteks provided his Google Hangouts account as rizzo*****@gmail.com. RP1 and Vorteks then moved their conversation to Google Hangouts. Vorteks' display name on Hangouts was FRANK RIZZO. At the outset of the Google Hangouts chat, RP1 provided the city and country that she lived in and FRANK RIZZO told her that he lived in Detroit, Michigan.

9. RP1 asked FRANK RIZZO for a photograph of his face, and he sent one. The photo depicted a white adult male wearing large sunglasses and a baseball cap. RIZZO asked RP1 how old she was, and she told him "13". RP1 sent RIZZO a photograph of the face of what appeared to be a female child. RIZZO responded, "ur beautiful".

10. On January 7, 2021, FRANK RIZZO sent RP1 a link to join a video chat through Google Meet. RP1 joined the video chat but did not turn her camera on. RP1 observed RIZZO masturbating.

11. On January 7, 2021, I served a subpoena to Google for subscriber information for account rizzo*****@gmail.com. On the same day Google provided the requested information. The subscriber name was listed as FRANK RIZZO, telephone 586-4**-****. The telephone number was determined to be associated with TextMe, which is an internet-based telephone number that does not require verification. Google also provided a list of IP addresses used by FRANK

RIZZO, however, all were associated with virtual private networks (VPN) some of which resolved to Costa Rica.

12. I have observed, through training and experience that VPNs are occasionally used by individuals engaged in child exploitation to mask their identities. Many VPNs allow a user to obtain an IP address from a geographic location of their choosing. Some VPNs are paid, while others are free. Common among both paid and free VPN services is that they do not keep logs, and law enforcement is generally not able to identify the users of those VPNs through legal process.

13. On or about January 7, 2021, FRANK RIZZO and RP1 were discussing butterflies. RP1 stated that she wanted to get a tattoo of one when she was older. RIZZO indicated that he had a tattoo and then sent RP1 the following photo of his tattoo:



14. On or about January 8, 2021, FRANK RIZZO and RP1 exchanged the following messages on Google Hangouts:

Sender	Message
RIZZO	Have u been thinking about yesterday a lot?
RP1	Yes
RIZZO	😊 I'm glad u enjoyed it
RIZZO	Wanna see if ur cam will work today?
RP1	Ok I think I can in a half hour if my mum goes to work
RIZZO	Ok, kool
RP1	Wat will we do if it works
RIZZO	I'll let u see again if that's ok
RP1	Ok
RIZZO	If ur cam works, can I see u down there?
RP1	Where
RIZZO	Between ur legs
RP1	Oh why tho
RIZZO	I like to see girls privates, especially if she's a good friend like u. and u got to see my privates, so I'd like to see ur's, too 😊

RP1	Ok. I never showd anyone b4 tho way if u don't like me coz I'm not big like grownups
RIZZO	Don't worry. I'm sure I will like u 

15. On January 8, 2021, after exchanging the above messages, RP1 joined FRANK RIZZO for a video chat. RIZZO appeared on camera wearing large sunglasses that obscured his face along with a large gaming type headset and ying yang (black and white) necklace. RIZZO appeared to be the same person in the photograph sent to RP1 earlier. RIZZO again displayed his bare penis to RP1. Once again, RP1 did not appear on camera.

16. After the video chat on January 8, 2021, RP1 told RIZZO that she couldn't chat because her 12-year-old neighbor was over and that RP1 was going to go to her house to play Playstation. RIZZO asked RP1 if her friend would want to see his "thing", and then suggested that RP1 should rejoin the video chat with her neighbor and let her watch. RP1 told RIZZO that she couldn't because her friend's mother was waiting for them to come home. RP1 stopped responding to RIZZO.

17. On January 24, 2021, FRANK RIZZO re-established communication with RP1 though Google Hangouts, telling her that he missed chatting with her. A few days later RIZZO told RP1 that he had some money problems and was behind on rent which took him away from chatting. The chats continued with general

discussions about life events. RIZZO repeatedly asked RP1 if she liked seeing his penis.

18. On February 18, 2021, RP1 indicated to FRANK RIZZO that she had shown a picture of his penis to her friend. RP1 and RIZZO then exchanged the following messages on Google Hangouts:

Sender	Message
RIZZO	Did your friend like seeing my big penis, too?
RP1	Yes she was shy tho
RIZZO	Yeah. Did she say anything about it after?
RP1	She said it was fun
RIZZO	Kool 😊 I bet her eyes got real big and wide when she first saw it. 😋
RP1	Yes how did u know
RIZZO	A long time ago, I used to show it to little girls like you and your friend in real life, & I got that reaction a lot
RP1	Wow did u
RIZZO	yup
RP1	Wer they ur gf
RIZZO	No, just girls I ran into in different places

19. On March 10, 2021, based in part upon the foregoing information I obtained a search warrant from this Court for Google account rizzo*****@gmail.com. The warrant was served to Google via electronic means on March 11, 2021.

20. On March 17, 2021, Google provided electronic documents pursuant to the search warrant for Google account rizzo*****@gmail.com. A review of the documents indicated the following:

- a. Google provided a copy of the chats between RP1 and FRANK RIZZO which matched the information provided to the FBI by RP1.
- b. Google provided a list of devices used by FRANK RIZZO which included at least one Windows PC and an LG-Q730 smartphone.
- c. Google provided a list containing over 6,000 IP addresses used by FRANK RIZZO, all but one was associated with a VPN. One IP address, used during a short timeframe on two separate days resolved to internet service provider Wide Open West, and geolocated to the area of Roseville, Michigan (geolocation of IP addresses is not exact).
- d. Google provided a list of websites accessed by the account which included websites for Omegle, ManyCam, and NordVPN.
- e. Google provided two associated email accounts: ich.liebe.***.*****@gmail.com and meditation*****@gmail.com.

21. On March 17, 2021, I served a subpoena to Google requesting subscriber information for accounts ich.liebe.***.*****@gmail.com and meditation*****@gmail.com. On the same date Google provided a response to the subpoena. Per the information provided by Google both accounts were setup for 2-factor authentication with telephone number 586-4**-***.

22. On March 17, 2021, a search of a public database indicated that telephone number 586-4**-*** was associated with GLEN WILLIAM VELLNER, date of birth XX/XX/1975, home address *****, Mount Clemens, Michigan 48043. VELLNER was listed as a sex offender in the State of Michigan.

23. On March 17, 2021, I conducted a search on the publicly available Michigan Sex Offender Registry website for GLEN WILLIAM VELLNER. The result included a photograph of VELLNER along with the information discovered in paragraph 22. The photograph appeared to be the same individual who had been chatting with RP1 as FRANK RIZZO. Per the registry website, VELLNER had been previously convicted of Criminal Sexual Conduct 2 (relationship) in 2001. In 2006 VELLNER was convicted of Child Sexual Abuse Activity. The 2006 conviction involved possession of child pornography of children as young as 6 years old.

24. On March 18, 2021, the FBI obtained GLEN WILLIAM VELLNER's Michigan Driver's License info, including photograph. The photograph appeared to be identical to the photograph of VELLNER on the Michigan Sex Offender Registry. VELLNER's address was listed as the same address referenced in paragraph 22.

25. On March 18, 2021, the FBI obtained records from the Michigan Department of Corrections (MDOC) which listed GLEN WILLIAM VELLNER's tattoos. One of his tattoos was described as follows: "Tattoo Arm Right Upper Harley Davidson bar & shield w/wings and cross and heart wrapped in ribbon". The tattoo as described appears to be identical to the one sent by the user of FRANK RIZZO to RP1.

26. On March 19, 2021 this Court authorized a Federal search warrant for VELLNER's residence, the address referenced in paragraph 22.

27. On March 24, 2021 the FBI served the search warrant. After a knock and announce, no response was received from inside. The door was breached, and I continued to announce our presence and order VELLNER to come to the door. After a short period rustling was heard from the rear of the apartment. Upon entry VELLNER was encountered in the hallway just outside his bedroom. No other persons were located in the residence. VELLNER was wearing the ying-yang necklace described above, and a tattoo was visible on his arm which matched the one described in this affidavit.

28. Located in VELLNER's bedroom, which matched the room depicted in screenshots provided by RP1, Agents located the large black sunglasses, gaming style headset, and white baseball cap depicted in photos sent by FRANK RIZZO to RP1.

29. SA Adam Christensen conducted a preview of electronic items in the residence, and I previewed VELLNER's cellular telephone which was located beside a Windows PC in VELLNER's bedroom.

30. On the cellular telephone I observed numerous social media applications such as Snapchat, KIK, and TextME. I also located the application NordVPN. Within the KIK application was a conversation with what appeared to be a 14-16 year old female. The chats were sexual in nature, and VELLNER had sent the apparent child images of his penis. The two discussed meeting up for sex, however, the female told VELLNER that her cousin was a cop and that VELLNER should be careful. VELLNER told the female that they could wait until she was 18 years old if she wanted.

31. SA Christensen previewed an Acer Windows PC (notebook) which was located on the desk in VELLNER's bedroom. Within a folder named "Logitech Webcam" SA Christensen located a video partially titled, "...9yovibe...". I reviewed the video which appeared depict an approximate 9-year-old female completely nude. The child was shown holding a vibrator on her bare vagina. SA

Christensen also located a VirtualMachine (virtual computer) within the Acer inside a folder titled “Frank Rizzo”.

32. Located in VELLNER’s bedroom were several spiral bound notebooks which appeared to contain usernames and passwords to Internet based accounts. The password for many of the accounts was “ILuv2RapeLiLgirls”.

33. SA Christensen located a Sandisk USB thumb drive beside the Acer Windows PC. The drive was labeled “Personal Files”. I reviewed the files on the thumb drive which appeared to contain images depicting child pornography. Three of those images are described below (filenames have been redacted):

- a. File1 – This image appears to depict a female infant or toddler who is completely nude. The child’s vagina is spread open by what appears to be an adult hand.
- b. File2 – This file appears to depict an approximate 6-8 year old female child. The child appears to be performing oral sex on an adult male.
- c. File3 – This file appears to depict an approximately 6-8 year old female. She appears to be nude and is shown performing oral sex on an adult male.

III. CONCLUSION

34. Based on the foregoing, there is probable cause to believe **GLEN WILLIAM VELLNER** has violated: 18 U.S.C § 2251 (attempted production of child pornography), 18 U.S.C. § 2252A(a)(2) (receipt of child pornography), 18

U.S.C. § 2252A(a)(5)(B) (possession of child pornography), 18 U.S.C. § 1470 (attempted transfer of obscene material to a minor), and 18 U.S.C. § 2422(b) (coercion and enticement of a minor to engage in unlawful sexual activity).

Respectfully submitted,



Raymond C. Nichols, Special Agent
Federal Bureau of Investigation

Sworn to before me and signed in my presence
and/or by reliable electronic means.



HON. KIMBERLY G. ALTMAN
UNITED STATES MAGISTRATE JUDGE

Date: March 24, 2021